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RESPONSE TO COMMENTS RECIEVED ON PRE-DRAFT SAMPLING AND ANALYSIS PLAN  
SITE 83 OPERABLE UNIT 1 (OU1) MCAS CHERRY POINT NC  
5/8/2009  
RHEA ENGINEERS & CONSULTANTS, INC

**OU1, SITE 83 – UFP-SAP  
MCAS CHERRY POINT, NORTH CAROLINA**

**RESPONSE TO COMMENTS  
FROM  
**PRE-DRAFT** SAMPLING AND ANALYSIS PLAN**

**MAY 8, 2009**

This document provides responses to comments received by Rhēa Engineers & Consultants, Inc. (Rhēa) on the Pre-Draft version of the OU1, Site 83 UFP-SAP. Comments have been incorporated into the Draft version of the OU1, Site 83 SAP. It should be noted that editorial comments were addressed, but not included in this response to comments.

**COMMENTS FROM: Jon Tucker (NAVFAC LANT Chemist)  
April 23, 2009**

COMMENT NO. 1: WS #2 – Question #5 on WS #2 is linked with WS #13. Though the previous documents are not SAPs they should be included on WS #2.

**RESPONSE: The Final Remedial Investigation was added to WS #2.**

COMMENT NO. 2: WS #3 – Laboratories, i.e. ECCS and TestAmerica, should be included on the distribution list. Any individual signing WS #4 to confirm that they have read the section for which they are responsible, must have an individual within their organization listed on WS #3 to ensure that they receive the document.

**RESPONSE: The laboratory contacts were added to WS #4.**

COMMENT NO. 3: WS #4 – Regulators and Project Managers that sign the approval page do not need to be included on WS #4. WS #4 is intended for those carrying out specific tasks laid out in the document.

**RESPONSE: Regulators and Project Managers were removed from WS #4.**

COMMENT NO. 4: WS #6 – Suggest removing Management of Data from WS #6. It is covered by Zach Wicks' responsibilities on WS #7.

**RESPONSE: Management of Data was removed from WS #6.**

COMMENT NO. 5: WS #8 – HAZWOPER 40 HR and 8 HR refresher are considered routing training and do not need to be included on WS #8.

**RESPONSE: Above-referenced training was removed from WS #8.**

COMMENT NO. 6: WS #10 – Beginning with WS #10, the header is skewed off the page and is cut off when printing.

**RESPONSE: The formatting has been fixed.**

COMMENT NO. 7: WS #11 – Please document why RSLs for industrial soil were chosen for the PALs. Example reasons can be future land use, risk assessment, and site specific calculations of realistic risk.

**RESPONSE: A sentence concerning future land use was added to WS #11.**

COMMENT NO. 8: WS #11 – Give a brief summary under Data Needed of how many samples you are starting with. Provide a brief description of the rationale that the number of samples is proper for the PQO's. The full rationale will be included on WS #17.

**RESPONSE: Further explanation of how many samples and why was added to WS #11.**

COMMENT NO. 9: WS #11 – Please document the level of data validation that will be performed.

**RESPONSE: Analytical results from each sample will be validated using procedures established by the National Functional Guidelines for Organic (USEPA, 1994) and Inorganic Analysis (USEPA, 1993).**

COMMENT NO. 10: WS #11 – Navy guidelines state that definitive data must be generated by a NFESC assessed laboratory. The mobile laboratory is excellent for searching for the extent of contamination, however an assessed laboratory should be used to confirm the clean limits of delineation. The suggestion is to send three samples from region A and two samples from region B to TestAmerica in addition to the lead samples. The heavy amount of sampling being done in region C will provide enough spatial trend data combined with the confirmation of the mobile lab for decision making.

**RESPONSE: The laboratory confirmation samples have been added to the SAP.**

COMMENT NO. 11: WS #11 – Exit Strategy is unclear. Delineation should not be the final goal for a sampling plan. A more appropriate environmental question and exit strategy would be: What volume of material will be remediated during the remediation phase? And the exit strategy will be that the delineation is complete and the FS and RI will be designed to remediate the material identified in this SAP as contaminated.

**RESPONSE: The above was clarified in WS #11.**

COMMENT NO. 12: WS #11 – Please document how hard copy data will be archived.

**RESPONSE: Hard copies will be archived at Rhēa’s office, as noted in WS #11.**

COMMENT NO. 13: WS #12 – Instrument blank, method blank, and LCS do not belong on WS #12. Laboratory QC samples are recorded on WS #28.

**RESPONSE: The lab QC samples were removed from WS #12.**

COMMENT NO. 14: WS #14 – Section 14.5 “Soil Sampling Procedures” belongs on WS #17 as sampling design. Please move this section over.

**RESPONSE: We kept “Soil Sample Procedures” in WS #14, Summary of Project Tasks, because it explains how samples are collected. Much of the same text was added to WS #17.**

COMMENT NO. 15: WS #17 – Please provide the rationale for halting sampling at the depth of 5 feet. Also please provide rationale for the number of samples being sufficient for delineation. It is suggested that the samples at point G-15 and K-8 on Figure 5 can be changed from secondary sampling locations to primary sampling locations.

**RESPONSE: Additional text was added to WS #17 explaining that sampling would go deeper if the 4-5 foot sample did not meet the RSL. Also, additional rationale for site delineation was added. Sample K-8 was changed from secondary to primary and sample location G-14 was added as a primary location. Sample G-15 will remain as secondary.**

COMMENT NO. 16: WS #15 – For future SAPs, PQL goals are decided upon by the project team and usually equal 1/3 of the PALs. They are not usually based on laboratory QLs. Since pesticide and PAH samples are now being sent to a fixed lab information concerning the MDLs and QLs also need to be included on WS #15 now.

**RESPONSE: The fixed laboratory information was added to WS #15.**

COMMENT NO. 17: WS #24 – Lead is not being analyzed by EPA 200.7 and information regarding its quality control limits is not needed.

**RESPONSE: References to Method 200.7 have been removed from WS #24.**

COMMENT NO. 18: WS #25 – For the mobile laboratory, do not complete the worksheet by listing the SOP that contains the information. Include the necessary information in the WS without having to reference the SOP.

**RESPONSE: Mobile laboratory SOP reference was removed.**

COMMENT NO. 19: WS #27 – Section #27.3 sample bottle labels should also include the tests being performed on that sample.

**RESPONSE: The required analysis was added to the text in section 27.3.**

COMMENT NO. 20: WS #28 – Internal Standards and Surrogates for pesticide and PAH analysis should be included on WS #28. The MS/MSD for metals should be included and it is not necessary to include annual PT samples unless they are requested specifically in support of this SAP.

**RESPONSE: The MS/MSD for metals was included and the annual PT samples were removed from WS #28-3.**

COMMENT NO. 21: WS #31 & #32 – The NFESC laboratory assessment of fixed base laboratories should be included with these worksheets.

**RESPONSE: The NFESC assessments were added to WS #31 and WS #32.**

COMMENT NO. 22: WS #36 – Please include the SAP worksheets that contain the quality control limits to which QC samples will be compared. When stating the use of National Functional Guidelines, be specific to state that the guidelines are being used to provide flagging guidance, and that the guidelines are not being used for any quality control limit criteria.

**RESPONSE: The SAP worksheet references were added and the above statement concerning the National Functional Guidelines was added.**

**COMMENTS FROM: Janice Nielsen (NAVFAC Mid-Atlantic Remedial Project Manager)**  
**April 24, 2009**

COMMENT NO. 1: Needs Decision Tree

**RESPONSE: A decision tree was added as Figure 6.**

COMMENT NO. 2: Verify if Sampling Equipment has rad source and work with Cherry Point to address.

**RESPONSE: The mobile laboratory does have a rad source. The lab has been in contact with MCAS EAD to obtain approval to enter the facility. This is now noted on WS #14.**

COMMENT NO. 3: Pg. 2 – Jeff Signature Line – Change to MCAS IRPM.

**RESPONSE: The MCAS title was modified.**

COMMENT NO. 4: Pg. 7 (Acronym List) – Change “HAZOPER” to “HAZWOPER.”

**RESPONSE: The above change was incorporated.**

COMMENT NO. 5: WS #6 – (Procedure Primary contact for Rhea) – EMD? What is this? If not typo needs to be added to the list of Acronyms.

**RESPONSE: Reference to EMD was removed.**

COMMENT NO. 6: WS #9-1 – Delete cell number for Jan Nielsen and delete entire Tim Wenk line. Add to Doug Bitterman and Bill Hannah Project Role is “user of data.”

**RESPONSE: The above suggested modifications were made to WS #9-1.**

COMMENT NO. 7: WS #9-2 – Delete cell number for Jan Nielsen. Add to Doug Bitterman and Bill Hannah Project Role is “user of data” and Tim Wenk “Recorder.”

**RESPONSE: The above suggested modifications were made to WS #9-2.**

COMMENT NO. 8: WS #9-2 – Suggest adding more of the meeting minutes.

**RESPONSE: The meeting minutes concerning the Site 83 SAP were inserted into WS #9-2. These minutes were not available at the time of the Pre-Draft SAP preparation.**

COMMENT NO. 9: WS #10.4 – Who are the anticipated recreational users?

**RESPONSE: Reference to recreational users was removed from WS #10.**

COMMENT NO. 10: WS #11 – Add Pre-confirmatory sampling to the type of data needed.

**RESPONSE: The above was added to WS #11.**

**COMMENTS FROM: Jeff Christopher (MCAS Cherry Point EAD IRPM)  
May 28, 2009**

COMMENT NO. 1: Pg. 3 (Executive Summary)-Paragraph 1 – Add “and MCAS Cherry Point Environmental Affairs Department [EAD]” after “Mid-Atlantic Division.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 2: Pg. 3 (Executive Summary)-Paragraph 1 – Add “and North Carolina Department of Environment and Natural Resources (NCDERN) is the State regulatory agency” to end of paragraph.

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 3: Pg. 3 (Executive Summary)-Paragraph 2 – Delete “which will be” and replace with “and.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 4: Pg. 3 (Executive Summary)-Paragraph 2 – Insert “soil” between “investigative” and “samples.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 5: Pg. 7 (Acronyms) – DDE – “Is the hyphen correct? If so, should the DDD and DDT also have hyphens?”

**RESPONSE: The hyphen was removed from DDE.**

COMMENT NO. 6: Pg. 7 (Acronyms) – Change “HAZOPER” to “HAZWOPER.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 7: Pg. 7 (Acronyms) – Include: NIRIS - Naval Installation Restoration Information Solution

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 8: WS #2 – Delete “Soil Delineation Sampling” (Only asks for the Site #).

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 9: WS #2 – 6. Add “and MCAS Cherry Point EAD” after “Mid-Atlantic.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 10: WS #5 – In Jeff Christopher’s box, delete “coordinator” and replace with “RPM.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 11: WS #6 – In Communication Drivers column, replace “Environmental Manager” with “Point of Contact with MCAS Cherry Point.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 12: WS #6 – In Procedure column, replace “USMC” with “MCAS.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 13: WS #6 – In Name column, is “TBD” intentional?

**RESPONSE: Bob Osmundson was added as Head Site Chemist.**

COMMENT NO. 14: WS #9-1 – In Project Role column, replace Janice Nielsen’s role with “Manages ER,N (CERCLA/MRP) activities for MCAS Cherry Point.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 15: WS #9-1 – In Project Role column, replace Jeff Christopher’s role with “Manages IRP environmental activities at MCAS Cherry Point”

**RESPONSE: The above suggested change was incorporated.**



COMMENT NO. 16: WS #9-1 – In Project Role column, Doug and Bill should be "Partnering Team" (or something to that effect; same for Tim)."

**RESPONSE: Doug and Bill's roles were changed to DATA USER and Tim was removed.**

COMMENT NO. 17: Pgs. 19-20 – Several editorial changes suggested to the meeting minutes.

**RESPONSE: The text on pages 19 and 20 is a quote from the Final Meeting Minutes; therefore, the suggested changes were not incorporated.**

COMMENT NO. 18: Pg. 23 – Beginning on page 23, the header is incorrectly placed (i.e. cut off) and needs to be corrected.

**RESPONSE: The formatting has been repaired.**

COMMENT NO. 19: WS#10.1-Paragraph 1 – Change from Figure "1" to Figure "2."

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 20: WS#10.1-Paragraph 2 – Delete "(Solid Waste Management Unit [SWMU] S-12)."

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 21: WS#10.1-Paragraph 4 – Change "SWMU" to "Solid Waste Management Unit (SWMU)."

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 22: WS#11-Response to main bullet #1-In parentheses – Add "MCAS EAD."

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 23: WS#11-Main bullet #4-Last sub-bullet – Why not collect 1-2 foot and hold to sample if above/below sample results indicate 1-2 foot interval needs to be analyzed.

**RESPONSE: This worksheet only described the samples that will be analyzed. Additional text was added to WS #14 and WS #17 concerning collecting a 1-2 foot sample.**

COMMENT NO. 24: WS#11-Response to main bullet 1 – "As many as necessary" is not very specific. It seems the SAP would be more specific; need to be more specific by either quantifying the number of samples and/or text describing the vertical/lateral extent of sampling.

**RESPONSE: The text was modified to indicate number of samples.**

COMMENT NO. 25: WS#11-Response to main bullet 8-Paragraph 2 – "Delete "NELAC" and replace with "National Environmental Laboratory Accreditation Conference (NELAC)."

**RESPONSE: NELAC was not spelled out at this point because it appears earlier in the SAP.**

COMMENT NO. 26: WS #14 – Unsure where to add it but need to include text on Navy approval of radiological containing laboratory equipment in the mobile lab.

**RESPONSE: Text concerning radiological source in the mobile laboratory was added to WS #14, section 14.2.**

COMMENT NO. 27: WS #14.5-Paragraph 1 – Again, see previous comment re 1-2 foot interval sample.

**RESPONSE: The collection of a 1-2 foot sample, as a secondary sample was added to the text in WS #14 and WS #17.**

COMMENT NO. 28: WS #14.9 – How will we ensure sampling equipment used in the diedrin removal area be considered non-haz (for disposal).

**RESPONSE: Equipment and PPE will be cleaned prior to disposal, and the rinsate water will be sent to the IWTP. Previous sampling indicated some risk that the soil may be hazardous due to dieldrin levels, but decontamination water would not be considered a risk.**

COMMENT NO. 29: FIGURES (after Pg. 80): "Operable" is misspelled on figure 2.

**RESPONSE: The above suggested change was incorporated.**

**COMMENTS FROM: Gena Townsend (EPA)  
May 18, 2009**

COMMENT NO. 1: Pg. 3 (Executive Summary)-Paragraph 1 – Delete last sentence (“USEPA Region 4 is the lead regulatory agency.”).

**RESPONSE: As discussed in the May 2009 Partnering meeting, the above sentence will remain, but “lead” was replaced with “federal.”**

COMMENT NO. 2: WS #3 – In E-mail Address or Mailing Address column, for Gena Townsend, delete “Waste Management” and replace with “Superfund.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 3: WS #9-1-Last sentence (Pg. 20) – This is an accurate depiction of the Site 83 discussion. However, it appears to be contradictory. It is stated that Hill would proceed to an FS, and yet we are reviewing a SAP for additional sampling. Another statement should be added explaining the change in direction.

**RESPONSE: An additional sentence, in italics, explaining the situation above was added to the end of WS #9-1.**

COMMENT NO. 4: WS #2-Response to no. 6 – Delete “Lead Regulatory Agency” and replace with “Federal Regulatory Agency.”

**RESPONSE: The above suggested change was incorporated.**

COMMENT NO. 5: WS #10.2.1-Paragraph 3 – Delete “uncertainly” and replace with “uncertainty.”

**RESPONSE: The above suggested change was incorporated.**

**COMMENTS FROM: George Lane (NCDENR State Environmental Project Manager), May 18, 2009**

COMMENT NO. 1: Page 11. From whom did you get my mailing address? It should be; George Lane, NCDENR, Superfund Section, 401 Oberlin Rd., Ste 150, 1646 Mail Service Center, Raleigh, NC 27699-1646. The FedEx address is correct.

**RESPONSE: Mr. Lane’s address has been corrected.**